

IN THE UNITED STATES DISTRICT COURT

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FOR THE SOUTHERN DISTRICT OF NEW YORK

D. GEORGE SWEIGERT

Case No.: 1:18-cv-08653-VEC-SDA

Plaintiff,

vs.

MOTION FOR LEAVE TO EXTEND TIME  
TO RESPOND TO SECOND AMENDED  
COMPLAINT

JASON GOODMAN,

Defendant

**MOTION FOR LEAVE TO EXTEND TIME TO RESPOND TO SECOND AMENDED  
COMPLAINT**

Defendant, Jason Goodman, Pro Se moves this Honorable Court for an extension of time to file a response to the Second Amended Complaint filed by Plaintiff, D. George Sweigert ("Plaintiff"), and states as follows:

1. The Intervenor Applicant Steve Outtrim is a known associate of Plaintiff. In the past, Outtrim has participated in coordinated activities with Plaintiff intended to disrupt Goodman's business, personal life and legal Defense. In the Virginia suit, (Steele v Goodman 3:17-cv-00601-MHL) Outtrim wrote a declaration in support of Plaintiff's motion to intervene. The motion was denied as the court in Virginia recognized the frivolous nature of their claims and their attempt to abuse the legal process. Outtrim's email of November 7, 2019 represents a demonstration of pattern and practice of frivolous intervention attempts intended to increase these proceedings. This new development causes the Defendant to request additional time to respond.

1           2.     No party would be prejudiced by the extension.

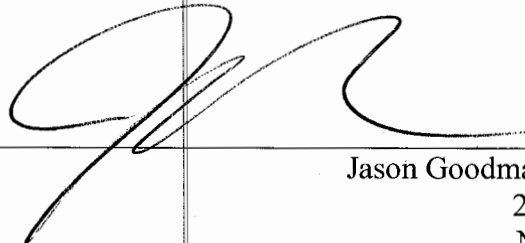
2           3.     The time to respond has not expired.

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5           WHEREFORE, Defendant, Jason Goodman, hereby requests that the Court enter an  
6 Order (1) granting her Motion for an Extension of Time; (2) providing Defendant with an  
7 extension of time to file his response to the Second Amended Complaint until on or before  
8 November 21, 2019; and (3) awarding Defendant such further relief as the Court deems  
9 appropriate.  
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1 I hereby attest that the pleadings herein are accurate and true under penalties of perjury.  
2 Further, I hereby attest that the attached exhibits are accurate and true copies of source  
3 documents as described.  
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5 Signed this \_\_12\_\_ day of November 2019  
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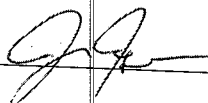
Jason Goodman, Defendant, Pro Se  
252 7<sup>th</sup> Avenue Apt 6s  
New York, NY 10001  
(323) 744-7594  
[truth@crowdsourcethetruth.org](mailto:truth@crowdsourcethetruth.org)

**CERTIFICATE OF SERVICE**

I hereby certify that on November 12, 2019, a true copy of the foregoing was sent via email to the following:

D. George Sweigert  
C/O General Delivery  
Rough & Ready, CA 95975

Signed this 12 day of November 2019



Jason Goodman, Defendant, Pro Se  
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New York, NY 10001  
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